

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
-----X

UNITED STATES OF AMERICA

v.

11 CR 199 (S-1) (CBA)

BENITO LÓPEZ-PÉREZ,  
JOSE GABINO BARRIENTOS-PÉREZ,  
alias "Ricardo," and  
ANASTASIO ROMEBRO-PÉREZ,

STATEMENT IN SUPPORT OF  
REQUEST FOR  
EXTRADITION PURSUANT TO 28 USC  
§ 1746

Defendants.

-----X

I, [REDACTED] Jane Doe 1, under penalty of perjury, make the following true and accurate statement:

1. I am a citizen of Mexico and currently reside in the United States.
2. In or about February 2005, when I was 14 years old, I met BENITO LÓPEZ-PÉREZ (hereinafter "LÓPEZ-PÉREZ") through some acquaintances in Puebla, Puebla, Mexico. A group of us went to the movies, and LÓPEZ-PÉREZ took everyone back to their houses. LÓPEZ-PÉREZ dropped everyone else off first, and I was left alone with him in the car. LÓPEZ-PÉREZ told me he was going to pick up his jacket at his house in Tenancingo, Tlaxcala, a town next to Puebla, before taking me to my house. However, after we got to his house, LÓPEZ-PÉREZ invited me in to meet his family. LÓPEZ-PÉREZ left me alone with his mother, who tried to tell me how wonderful her son was and how lucky I was to be with him. I told her that I had a boyfriend, but she did not stop. When LÓPEZ-PÉREZ came back, he told me that he was not going to take me home. He took me to a bedroom and raped me. I tried to resist, but he did not stop.

3. The following day, I begged LÓPEZ-PÉREZ to let me go. Although LÓPEZ-PÉREZ told me I could leave, he did not take me anywhere, and I did not know where I was. LÓPEZ-PÉREZ then locked me in a room for most of the day. Later, he showed me a piece of paper that had some numbers on it and he explained to me that he had a debt, and that he and his family would be arrested and their property would be seized if it was not paid within a few days. He told me that I could make money working as a prostitute at a bar to help him pay the debt. When I told him that I did not want to work in a bar, he got angry and he told me I was going to do it whether I liked it or not. After again locking me in the room for hours, he came back and asked me whether I had changed my mind. When I said no, he hit me and told me to shut up, and said that he would never let me leave. He threatened to kill my whole family if I tried to leave.

4. The next day, LÓPEZ-PÉREZ explained the rules to me, which were that I could never go out alone and that I had to do everything he said. I was also told that I had to obey LÓPEZ-PÉREZ's sister, [REDACTED], or she would beat me. I did not have a telephone with me, and I did not know the address or the phone number of the place where I they had me.

5. A few days later, LÓPEZ-PÉREZ's sister, [REDACTED], took me to a bar in order for me to start working as a prostitute. LÓPEZ-PÉREZ had bought me some short, suggestive clothing that he told me I had to wear for the job. At the bar, [REDACTED] put me in a room with a man who raped me. Then [REDACTED] took money from the man and told me that I had to give her all the money I made and that she would search me to make sure I did not keep any of the money.

6. I was forced to work as a prostitute in Mexico for LÓPEZ-PÉREZ for approximately five or six months. I kept asking LÓPEZ-PÉREZ to let me see my family, but he refused. After about the first three months, LÓPEZ-PÉREZ allowed me to see my family in Oaxaca, but on the condition that I falsely tell them that everything was fine. LÓPEZ-PÉREZ and some of his relatives went with me to Oaxaca and introduced themselves to my mother as if they were generous and honorable citizens. LÓPEZ-PÉREZ told my mother that I was fine, and I answered my mother's questions with what LÓPEZ-PÉREZ had told me to tell her, lying to my mother and telling her that I was fine. Because of LÓPEZ-PÉREZ's threats, I feared for my safety and my family's safety if I refused to go with him and tried to stay with my family in Oaxaca. So, I left Oaxaca with LÓPEZ-PÉREZ.

7. After I had worked for LÓPEZ-PÉREZ for approximately five or six months and I had turned 15, LÓPEZ-PÉREZ told me that we were going to cross the border to the United States because the work would be easier and he would make more money. I told LÓPEZ-PÉREZ that I did not want to go, but he did not change his mind. He made arrangements with "coyotes" to smuggle us across the border between the United States and Mexico. Once we had crossed the border, we were transported in vehicles to Phoenix, Arizona, and then to Las Vegas, Nevada. In Las Vegas, we took an airplane to New York, using fake IDs that the coyotes had given us.

8. When we arrived in New York, they took me to an apartment where LÓPEZ-PÉREZ's brother, who I knew only as "Ricardo," was waiting. Subsequently, I was forced to provide sexual services to clients at private residences, being transported from appointment to appointment by people who worked for LÓPEZ-PÉREZ,

as if it were a home delivery food service. On any given day, the minimum number of clients I served was 10 and the maximum was 40. I was forced to turn over all the money to the person who transported me, and if I tried to keep any of the money for myself, I would receive a beating.

9. This lifestyle continued for more than five years. During this time I was too afraid to escape, since I was beaten constantly by LÓPEZ-PÉREZ and other people who worked for him, and I had been warned that if I tried to leave they would kill my family. LÓPEZ-PÉREZ would beat and rape me regularly to control me. He would beat me with his fists and with objects like telephone cables and belts. Even after LÓPEZ-PÉREZ went back to Mexico, I was never left alone. There was always someone with me who was watching me to make sure I did not escape.

10. Approximately two years after my arrival in the United States, I called LÓPEZ-PÉREZ in Mexico and begged him to let me go back to Mexico to see my mother. After I threatened to leave him and go to the police if he refused to let me see my mother, LÓPEZ-PÉREZ gave in. He gave me fake documents in the name of his sister [REDACTED] in order to be able to travel. Because the Mexican consulate said that I needed my mother's permission to travel as a minor, LÓPEZ-PÉREZ had his sister pretend to be my mother in order to give permission before the consulate. When I arrived in Mexico, LÓPEZ-PÉREZ picked me up at the airport. He took me to his house and gave me a severe beating, telling me that if I ever threatened him again he would kill me and my mother. After that, he took me to my mother's house for a brief visit, but only after giving me a script that I had to follow. Consequently, when I saw my mother, I told her that I was fine, although nothing was fine at all. I wanted to tell my mother the truth, but I was scared

that LÓPEZ-PÉREZ would kill my mother and me if I did.

11. After the visit with my mother, LÓPEZ-PÉREZ took me back to Tenancingo, where I stayed until late summer or early fall of 2007. Around that time, LÓPEZ-PÉREZ sent me back to the United States with 14-year-old girl named [REDACTED], who was the girlfriend of LÓPEZ-PÉREZ's brother, ANASTASIO ROMERO-PÉREZ (hereinafter "ROMERO-PÉREZ"), as well as being the sister of Ricardo's wife, [REDACTED]. [REDACTED] (LÓPEZ-PÉREZ's sister) and ROMERO-PÉREZ were waiting for us when we arrived in Queens, New York. Subsequently, they took [REDACTED] and me to prostitution places around the city of New York and forced us to provide services to clients. As before, I was too scared to escape because LÓPEZ-PÉREZ and the people who enforced his orders continued to watch my every move. LÓPEZ-PÉREZ came to the United States several months later. After that, he traveled back and forth several times between the United States and Mexico.

12. While I was in New York, I lived in various apartments with LÓPEZ-PÉREZ and other members of his family, including Ricardo and his wife, [REDACTED], who was forced to work for Ricardo as a prostitute, and ROMERO-PÉREZ and his girlfriend, [REDACTED], the 14-year-old sister of [REDACTED] with whom I traveled to the United States in 2007 and who had been forced to work as a prostitute for ROMERO-PÉREZ.

13. In or about September 2009, LÓPEZ-PÉREZ returned to Mexico, leaving me under the control of his sister, [REDACTED]. LÓPEZ-PÉREZ told me that he had to go because the police were looking for him. After LÓPEZ-PÉREZ left, I did not escape because I was afraid that LÓPEZ-PÉREZ or one of his accomplices

would kill my family, as he had threatened. At that time, I was living in an apartment in Queens, New York with [REDACTED]. LÓPEZ-PÉREZ returned in or about November 2009, and he moved [REDACTED] and me to another department. In or about January, 2010, LÓPEZ-PÉREZ went to Mexico again.

14. In or about August or September 2010, I escaped with the help of a Mexican couple I had met at a Laundromat. At that time, LÓPEZ-PÉREZ wanted me to go back to Mexico so he could keep a close watch on me, and because he thought I could make more money for him in Mexico. I was able to escape late one night because LÓPEZ-PÉREZ and his accomplices thought that I was going to Mexico. With the help of the Mexican couple, I went to a domestic violence center, and from there I was placed in a shelter for victims of this type of violence. During this entire time, LÓPEZ-PÉREZ was calling me and threatening to harm me and my family, and he threatened to have me arrested.

15. **Attachment E-1** to this statement is a photograph of BENITO LÓPEZ-PÉREZ. **Attachment E-2** to this statement is a photograph of Ricardo, LÓPEZ-PÉREZ's brother, whose real name is JOSÉ GABINO BARRIENTOS-PÉREZ. **Attachment E-3** to this statement is a photograph of another one of LÓPEZ-PÉREZ's brothers, ANASTASIO ROMERO-PÉREZ.

16. Given the limited purposes of this statement, I have not set forth herein all of the facts related to this matter of which I have knowledge.

I declare under penalty of perjury that the foregoing is true and accurate.

Signed this 28 day of November, 2011.

Jane Doe 1